PERIODIC REVIEW

Westlund Building
Facility Site ID#: 39249397

1309 Summit Avenue (former),
1200 University (current),
Seattle, Washington

Northwest Region Office

TOXICS CLEANUP PROGRAM

January 2010

1.0 INTRODUCTION

This document is a review by the Washington State Department of Ecology (Ecology) of post-cleanup site conditions and monitoring data to ensure that human health and the environment are being protected at the Wesmar Facility (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed under the Voluntary Cleanup Program (VCP). The cleanup actions resulted in concentrations of petroleum hydrocarbons remaining at the Site which exceed MTCA cleanup levels. The MTCA cleanup levels for soil are established under WAC 173-340-740. The MTCA cleanup levels for groundwater are established under WAC 173-340-720. WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a site every five years under the following conditions:

(a) Whenever the department conducts a cleanup action
(b) Whenever the department approves a cleanup action under an order, agreed order or consent decree
(c) Or, as resources permit, whenever the department issues a no further action opinion;
(d) and one of the following conditions exists:
    1. Institutional controls or financial assurance are required as part of the cleanup
    2. Where the cleanup level is based on a practical quantitation limit
    3. Where, in the department's judgment, modifications to the default equations or assumptions using site-specific information would significantly increase the concentration of hazardous substances remaining at the site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

(a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the site;
(b) New scientific information for individual hazardous substances of mixtures present at the site;
(c) New applicable state and federal laws for hazardous substances present at the Site;
(d) Current and projected site use;
(e) Availability and practicability of higher preference technologies; and
(f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The Department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site Description and History

The site is located at the block of Summit Avenue, East Union Street, Minor Avenue, and University Street. The 1309 Summit Avenue in Seattle, Washington, is the address that appears in Ecology files and also in county records. The Westlund Building was razed and the site was redeveloped into a 13-story retirement facility by the Kline Galland Center known as the Summit at First Hill with an address on the building as 1200 University Street.

2.2 Site Investigations and Sample Results

The leaking underground storage tanks (USTs) were a 500 gallon diesel tank and an approximately 1700 gallon Bunker C heating oil tank, both previously located under the breezeway of the former Westlund Building.

The leaking 500 gallon diesel UST was discovered on July 15, 1999 by the consultant, Golder and Associates (Golder). Approximately 2 cubic yards (cy) of soil was excavated and diesel contaminated soil (approximately 2800 milligrams per kilogram [mg/kg]) was discovered at a depth of 7 feet below ground surface (bgs) or 294 feet above mean sea level (amsl). Pacific Specialty Construction, Inc. (PSCI) of Bothell, Washington (a licensed UST removal contractor) was contracted by Golder to obtain a City Fire Department UST removal permit and to pump, rinse, inert, and dispose of the UST. Golder, working with the general contractor (Sellen), decided to leave the materials in place for approximately 1 week until excavation activities allowed for removing these materials. Twelve days later, during soldier pile installation (on July 27, 1999) in the area of the former breezeway (east of the former 500 gallon diesel UST) the construction crew encountered petroleum contaminated soils extending from approximately 290 feet amsl to 275 feet amsl level.

During further excavation on August 2, 1999 in the former breezeway, in the area near the new soldier piles, and just east of the former diesel UST, Golder discovered an additional 1700-gallon Bunker C heating oil UST. Golder again contracted with PSCI to obtain a City Fire Department UST removal permit, and to pump, rinse, inert and disposes of this UST. Golder had access after disposal of this tank, to begin a full assessment of the area impacted by diesel and heavy oil contamination. They reported this leaking UST to the Ecology as required. Golder provided oversight services during this removal, having a State certified UST Assessor observe.

The approach to determining the impacts of the diesel/heavy oil contaminated soil involved the advancement of multiple soil borings. Golder advanced the borings in the area below the former breezeway and in areas to the south under former Westlund Building footing, and to the north under the current John Wallace Building, and to the northwest under the alley west of the John Wallace Building. They also advanced a boring east of the impacted area to determine the migration in that direction. Two borings were advanced to the groundwater, a depth of approximately 75 feet bgs or at elevation 225 feet amsl. This was done to determine the vertical

extent of contaminated soils and most importantly, if groundwater was impacted underlying the Site. 5 additional borings were advanced to determine the lateral extent of diesel/oil contaminated soils. The borings, which did not go to the water table, were advanced to elevations ranging from 248 feet to 270 feet amsl. The monitoring well was installed in the alley just northeast of the former breezeway (leaking UST area). The well was located here because the most likely groundwater gradient direction was thought to be to the northwest, given the topography, which is steeply sloped to the northwest, and based on water table data obtained from the two former piezometers located near Minor Street.

It was evident that soil has been contaminated with diesel/heavy oil, including soils underlying the current John Wallace Building to the north of the former leaking USTs. However, groundwater had not been impacted. Of note, the one groundwater sample with a reported 0.78 milligrams per liter (mg/L) diesel was not collected from a monitoring well, but from the boring itself without being developed, purged, or stabilized. This information is therefore considered questionable, since the laboratory data for soils in the boring indicate that diesel/heavy oil contamination ends at approximately 255 feet amsl, some 30 feet above the groundwater table. The sample was likely cross contaminated from petroleum contaminated soils at the top of the boring.

The nature of contamination is consistently a roughly even mix of diesel and heavy oil, based on the results of the total petroleum hydrocarbon identification test (TPH HCID) and diesel hydrocarbon test (TPH-Dx) results. It was thought that the leaking diesel UST dissolved heavier oils which had leaked from the Bunker C heating oil UST located next to it and approximately 4 feet deeper. The data appears to show that soils are contaminated from approximately 290 feet amsl down to approximately 255 feet amsl. Contamination also extends at least approximately 20 feet north of the southern wall into the soils underlying the John Wallace Building, and to similar depths, i.e., approximately 270 feet amsl. This is based on the results of the soil samples collected from the structural tie-back borings advanced on August 4, 1999. These borings were advanced 24 feet deep at a 30° angle. The soil samples representing these tie back borings were composites collected from the stockpile adjacent to three borings located in the main spill area. Samples collected on the eastern and western sides of the former USTs (GBH4 and GBH5) shows that diesel/heavy oil contamination tapers off at approximately 10 feet west of the former diesel tank, just west of Soldier Pile No. 11, and east to Soldier Pile No. 16, approximately 15 feet east of the former Bunker C oil UST. The heaviest contamination is associated with the area adjacent to the former leaking USTs, between Soldier Piles 11 and 15. Petroleum also extends approximately 35 feet south of the former USTs to the north end of the pit for the elevator shaft. Petroleum contaminated soil appeared in a relatively narrow band approximately 6 feet thick along the northern pit boundary.

2.3 Cleanup Actions

All soils removed during drilling were stockpiled for disposal at a licensed disposal facility, Remedco, Inc. of Seattle.

Samples from Boring Nos 4 through 7 all showed evidence of decreasing concentrations at depth from approximately 288 to 268 feet amsl. However, the data indicates that mix of diesel/heating oil migrated along seams of varying permeabilities within the underlying soils so that it appears to have moved in "stringers" of various depths. Samples GBH2-5 and GBH1-7 were analyzed according to the VPH/EPH method in order to use the Interim TPH Risk Assessment Worksheet. Golder chose sample GBH2-5 because it was closest to the location of the source, the former leaking USTs, and was also one of the most impacted soils (29,000 mg/kg total TPH). They chose sample GBH1-7 because it represents a deeper, downgradient location. The results show that groundwater is not expected to be impacted by the overlying contaminated soils, principally because the diesel/heavy oil are a mix of primarily long-chain petroleum hydrocarbons. The direct contact pathway is not completed since the soils are at depth and will be buried beneath a building where human contact is not possible. However, given that the soils contain concentrations as high as 3% petroleum by weight, it is expected that residual saturation may act to advance contamination further. Yet given that groundwater is some 25 to 30 feet deeper than the deepest extent of contamination found at 255' amsl, it would take considerable time to migrate, therefore, it is expected that contamination has ceased migrating vertically, given the likely age of the spill.

Since groundwater is not impacted and since contaminated soils are at elevations considerably higher than the water table (approximately 30 feet), future impacts to groundwater are not likely. Given that petroleum contamination extends underneath the John Wallace building to the north of the subject site, it is impossible at this time to remove all of the impacted soils, since doing so would undermine the stability of the John Wallace building.

Since petroleum contaminated soils underlying the John Wallace Building will need to be kept in place and the impacted onsite soils will be capped with a new foundation, it was not believed that further excavation at the Site during redevelopment (the Summit at First Hill Project) was necessary. The bulk of the impacted soils are at considerably higher elevations than the groundwater; most are approximately 45 to 65 feet higher (270 feet to 290 feet amsl) and the contamination consists of mainly non-mobile heavy hydrocarbon fractions. The remedy to address the petroleum contaminated soils was to leave the remaining petroleum impacted soils in place, with excavation limited to the foundation design (foundation depth of approximately 285 feet amsl). The elevation of the foundation is over 15 feet deeper than the ground surface at 301 feet amsl; therefore 16 feet of soil, much of which was petroleum contaminated, was excavated and removed off-site to a licensed disposal facility. The remaining contaminated soils were treated with a passive soil vapor extraction system over the highly impacted soils immediately beneath the foundation floor. A limited program of groundwater monitoring was conducted in the well installed in the alley to observe if groundwater impacts occur in the future.

Groundwater was satisfactorily tested at well GMW-1, installed at a depth of 75 feet bgs, or 225 feet amsl. Petroleum was not detected in either of the two groundwater monitoring tests conducted on August 6, 1999, and November 30, 1999, at the former Westlund Building Site (currently the Summit of First Hill Building). A 'No Further Action' (NFA) letter was issued for the Site on October 6, 1999 after the restrictive covenant was recorded.

2.4 Cleanup Levels

Cleanup levels for the contaminated soil were MTCA Method A standards, met at a conditional point of compliance. Groundwater cleanup levels were MTCA Method A, met at a standard point of compliance, although there was no indication that groundwater was affected.

2.5 Restrictive Covenant

Based on residential Site use, surface cover and cleanup levels, it was determined that the Site was eligible for a 'No Further Action' determination if a Restrictive Covenant was recorded for the property. A Restrictive Covenant was recorded for the Site in 1999 which imposed the following limitations:

Section 1. "A portion of the Property contains diesel and heavy oil range petroleum hydrocarbon contaminated soil located under the southwest portions of the John Wallace Building and the northern portions of the Summit at First Hill Building. The soils are found below the building footings to an approximate depth of 35 feet. The areas of concern are detailed in the figures attached as Exhibit B hereto, and are also outlined in the document referenced above. The Owner shall not alter, modify, or remove the existing structures[s] in any manner that may result in the release or exposure to the environment of that contaminated soil or create new exposure pathway without prior written approval from Ecology."

"Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas, upon completion of the building construction, include drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike, or similar item, bulldozing or earthwork."

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, 1ease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action, to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

The Restrictive Covenant is available as Appendix 6.4.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

The Restrictive Covenant for the Site was recorded and is in place. This Restrictive Covenant prohibits activities that will result in the release of contaminants at the Site without Ecology's approval, and prohibits any use of the property that is inconsistent with the Covenant. This Restrictive Covenant serves to ensure the long term integrity of the remedy.

Based upon the site visit conducted on January 27, 2010 the remedy at the Site continues to eliminate exposure to contaminated soils by ingestion and contact. The asphalt appears in satisfactory condition and no repair, maintenance, or contingency actions have been required. The Site is still operating as a residential facility. A photo log is available as Appendix 6.5.

Soils with petroleum concentrations higher than MTCA cleanup levels are still present at the Site. However, the remedy prevents human exposure to this contamination by ingestion and direct contact with soils. The Restrictive Covenant for the property will ensure that the contamination remaining is contained and controlled.

3.2 New scientific information for individual hazardous substances for mixtures present at the Site

There is no new scientific information for the contaminants related to the Site.

3.3 New applicable state and federal laws for hazardous substances present at the Site

The cleanup at the site was governed by Chapter 173-340 WAC (1996 ed.). WAC 173-340-702(12) (c) [2001 ed.] provides that,

"A release cleaned up under the cleanup levels determined in (a) or (b) of this subsection shall not be subject to further cleanup action due solely to subsequent amendments to the provision in this chapter on cleanup levels, unless the department determines, on a case-by-case basis, that the previous cleanup action is no longer sufficiently protective of human health and the environment."

Although cleanup levels changed for petroleum hydrocarbon compounds as a result of modifications to MTCA in 2001, contamination remains at the site above the new MTCA Method A and B cleanup levels. Even so, the cleanup action is still protective of human health and the environment. A table comparing MTCA cleanup levels from 1991 to 2001 is available below.

Analyte	1991 MTCA Method A Soil Cleanup Level (ppm)	2001 MTCA Method A Soil Cleanup Level (ppm)	1991 MTCA Method A Groundwater Cleanup level (ppb)	2001 MTCA Method A Groundwater Cleanup Level (ppb)
Cadmium	2	2	5	5
Lead	250	250	5	15
TPH	NL	NL	1000	NL
TPH-Gas	100	100/30	NL	1000/800
TPH-Diesel	200	2000	NL	500
TPH-Oil	200	2000	NL	500

NL = None listed

3.4 Current and projected site use

The site is currently used for residential purposes. There have been no changes in current or projected future site or resource uses.

3.5 Availability and practicability of higher preference technologies

The remedy implemented included containment of hazardous substances, and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

3.6 Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the remedial action were capable of detection below selected site cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the site.

4.0 CONCLUSIONS

The following conclusions have been made as a result of this periodic review:

- The cleanup actions completed at the Site appear to be protective of human health and the environment.

- Soils cleanup levels have not been met at the standard point of compliance for the Site; however, the cleanup action has been determined to comply with cleanup standards since the long-term integrity of the containment system is ensured, and the requirements for containment technologies are being met.

- The Restrictive Covenant for the property is in place and continues to be effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this periodic review, the Department of Ecology has determined that the requirements of the Restrictive Covenant continue to be met. No additional cleanup actions are required by the property owner. It is the property owner's responsibility to continue to inspect the site to assure that the integrity of the remedy is maintained.

4.1 Next Review

The next review for the site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

Groundwater Monitoring Report, dated January 4, 2000, by Golder Associates;

Diesel/Heavy Oil Contaminated Soil Assessment, dated August 19, 1999, by Golder Associates;

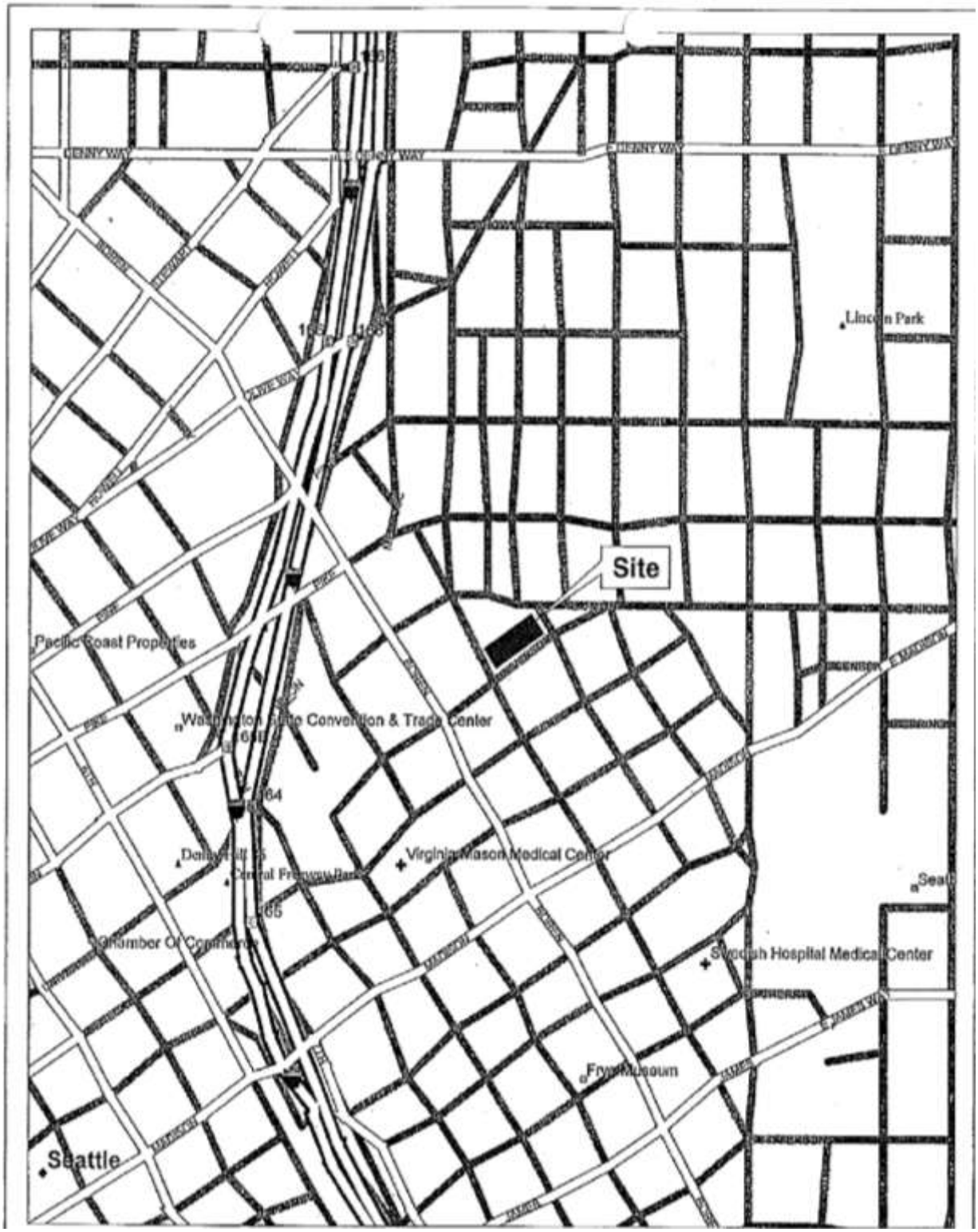
Analytical Data, dated August 11, 1999, by OnSite Environmental, Inc.;

Ecology, 1999, Restrictive Covenant;

Ecology, 2010, Site Visit.

6.0 APPENDICES

6.1 Vicinity Map



6.2 Site Plan

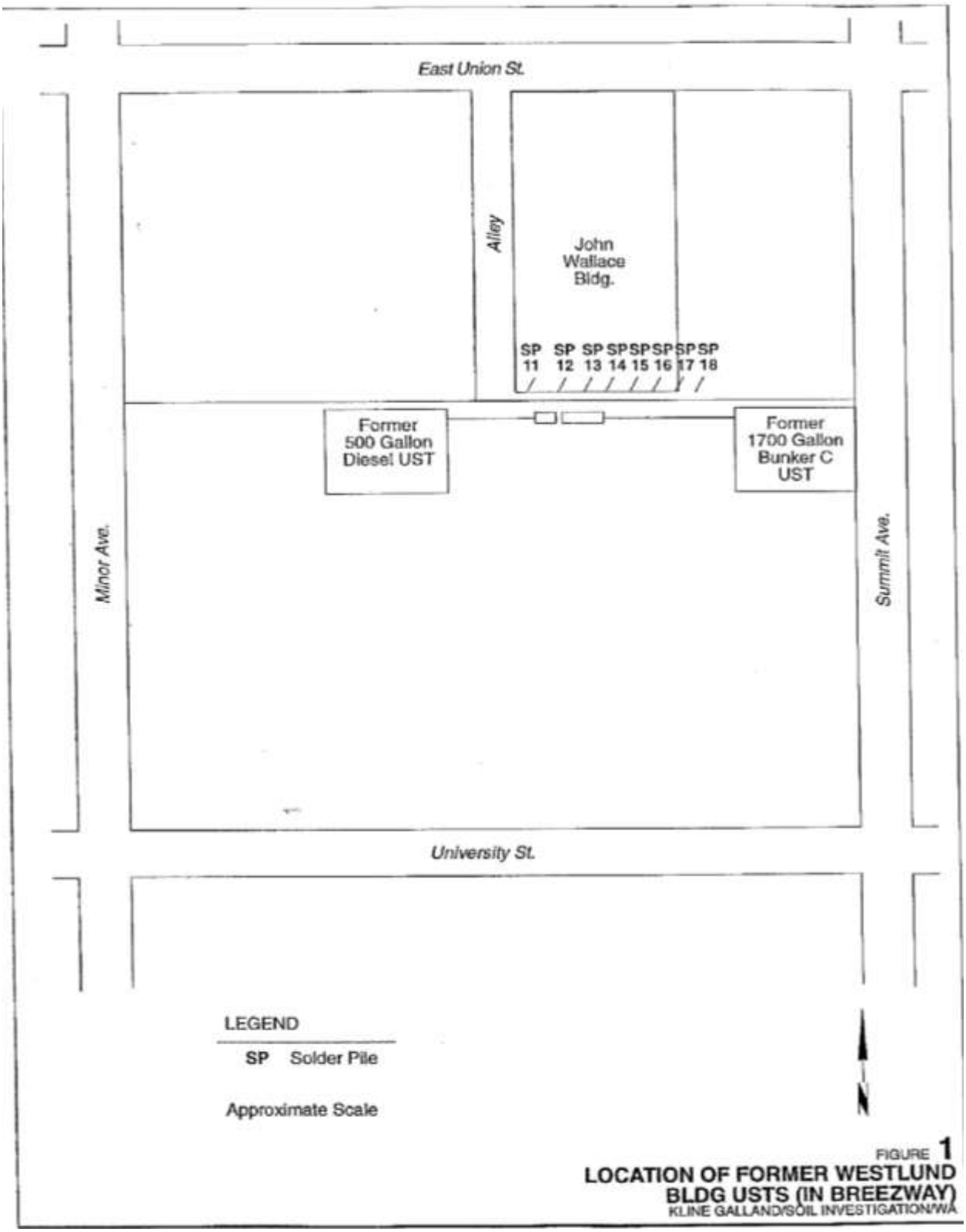


FIGURE 1
LOCATION OF FORMER WESTLUND BLDG USTS (IN BREEZWAY)
KLINE GALLAND/SOIL INVESTIGATION/WA

6.3 TPH Location Map

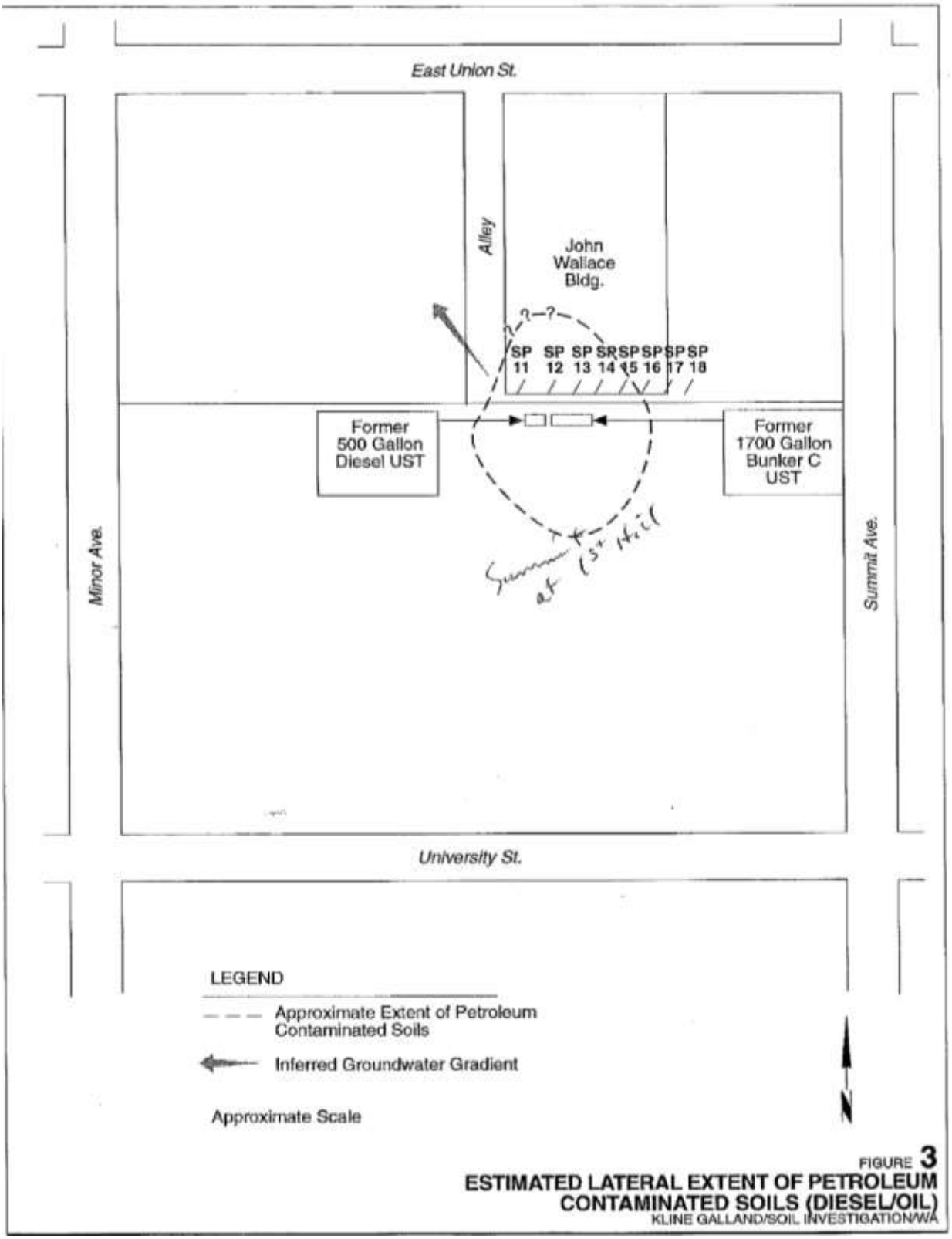


FIGURE 3
ESTIMATED LATERAL EXTENT OF PETROLEUM CONTAMINATED SOILS (DIESEL/OIL)
KLINE GALLAND/SOIL INVESTIGATION/WA

6.4 Environmental Covenant

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AFTER RECORDING RETURN DOCUMENT TO:
Rick Fria
The Fria Company Inc.
1621 114th Ave. SE, Ste. 220
Bellevue, WA 98004

Reference Number of Related Document: N/A
Grantor(s): The Kline Galland Center
Grantee(s): Department of Ecology
Abbreviated Legal Description: Lots 8, 9, 10 and 11 in Block 125, A. A. Denny's Broadway Addition to the City of Seattle
Additional Legal Description is on Exhibit A to Document
Assessor's Property Tax Parcel or Account Nos.:Lot 8: 197820-0860-01; Lots 9 and 10: 197820-0865-06; Lot 11: 197820-0875-04

1ST AM-S M-1 3259-5K
(10)

COURTESY RECORDING ONLY...
NO LIABILITY FOR VALIDITY AND/OR ACCURACY ASSUMED BY FIRST AMERICAN TITLE INSURANCE COMPANY

RESTRICTIVE COVENANT REGARDING REMEDIAL ACTION AT THE KLINE GALLAND CENTER SUMMIT AT FIRST HILL PROPERTY

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030 (1) (f) and (g) and WAC 173-340-440 by The Kline Galland Center, its successors and assigns, and the State of Washington Department of Ecology, its successors and assigns (hereafter "Ecology").

An independent remedial action (hereafter "Remedial Action") occurred at the property that is the subject of this Restrictive Covenant. The Remedial Action

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conducted at the property is described in the following document: Diesel/Heavy Oil Contaminated Soil Assessment - Former Westlund Building - Seattle, Washington (Golder, 1999). This document is on file at Ecology's Northwest Regional Office.

This Restrictive Covenant is required because the Remedial Action resulted in residual concentrations of diesel and heavy oil range petroleum hydrocarbons which exceed the Model Toxics Control Act Methods A and B Residential Cleanup level (s) for soil established under WAC 173-340-440.

The undersigned, The Kline Galland Center, is the fee owner of real property (hereafter "Property") in the County of King, State of Washington, that is subject to this Restrictive Covenant. The Property is legally described in Exhibit A of this Restrictive Covenant and made a part hereof by reference.

The Kline Galland Center makes the following declarations as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner").

Section 1. "A portion of the Property contains diesel and heavy oil range petroleum hydrocarbon contaminated soil located under the southwest portions of the John Wallace Building and the northern portions of the Summit at First Hill Building. The

soils are found below the building footings to an approximate depth of 35 feet The areas of concern are detailed in the figures attached as Exhibit B hereto, and are also outlined in the document referenced above. The Owner shall not alter, modify or remove the existing structures [s] in any manner that may result in the release or exposure to the environment of that contaminated soil or create new exposure pathway without prior written approval from Ecology."

"Any activity on the Property that may result in the release or exposure to the environment of the contaminated soil that was contained as part of the Remedial Action, or create new exposure pathway, is prohibited. Some examples of activities that are prohibited in the capped areas, upon completion of the building construction, include: drilling, digging, placement of any objects or use of any equipment which deforms or stresses the surface beyond its load bearing capability, piercing the surface with a rod, spike or similar item, bulldozing or earthwork."

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the

Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. The Owner of the property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect remedial actions conducted at the property, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit

use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

Dated this 23rd day of Sept, 1999.

GRANTOR:

The Kline Galland Center,
a Washington nonprofit corporation

By: _____
Its: C.E.O

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STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

On this day personally appeared before me Joshua H. Saddler to me known to be the Chief Executive Officer of The Kline Galland Center, a Washington nonprofit corporation, the company that executed the within and foregoing instrument, and acknowledged the instrument to be the free and voluntary act and deed of said company for the uses and purposes therein mentioned, and on oath stated that he was duly authorized to execute said instrument on behalf of said company.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 23rd day of September, 1999.

Maudell L. Kromer
MAUDELL L. KROMER
(print or type name)
NOTARY PUBLIC in and for the State of Washington, residing at Seattle
My Commission expires: 11-30-99

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EXHIBIT A

Legal Description of Property

Lots 8, 9, 10 and 11 in Block 125, A.A. Denny's Broadway Addition to the City of Seattle, as per plat recorded in Volume 6 of Plats at page 40, records of King County, Washington, situated in the City of Seattle, County of King, State of Washington.

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EXHIBIT B

Figures (See Following Two Pages)

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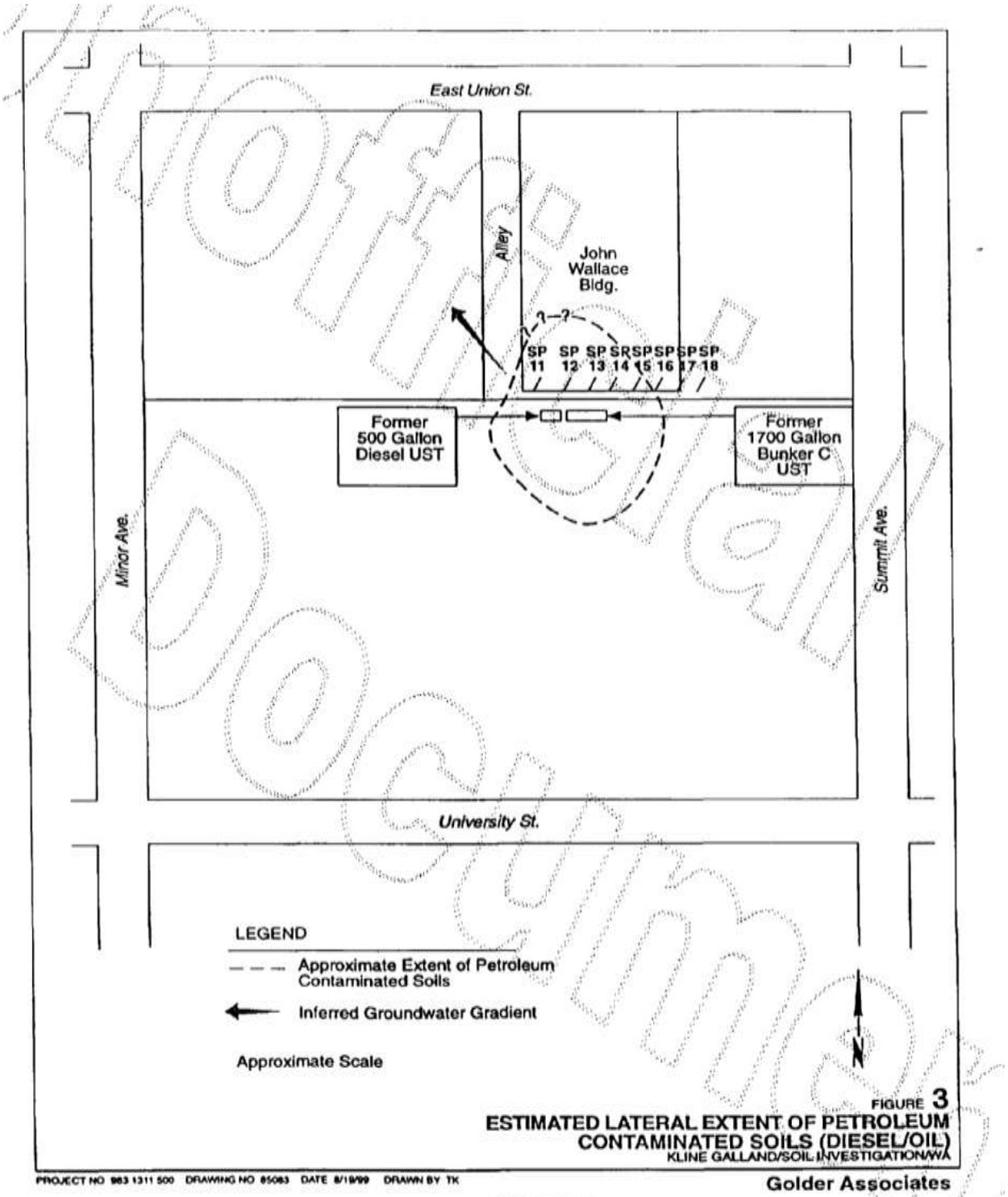
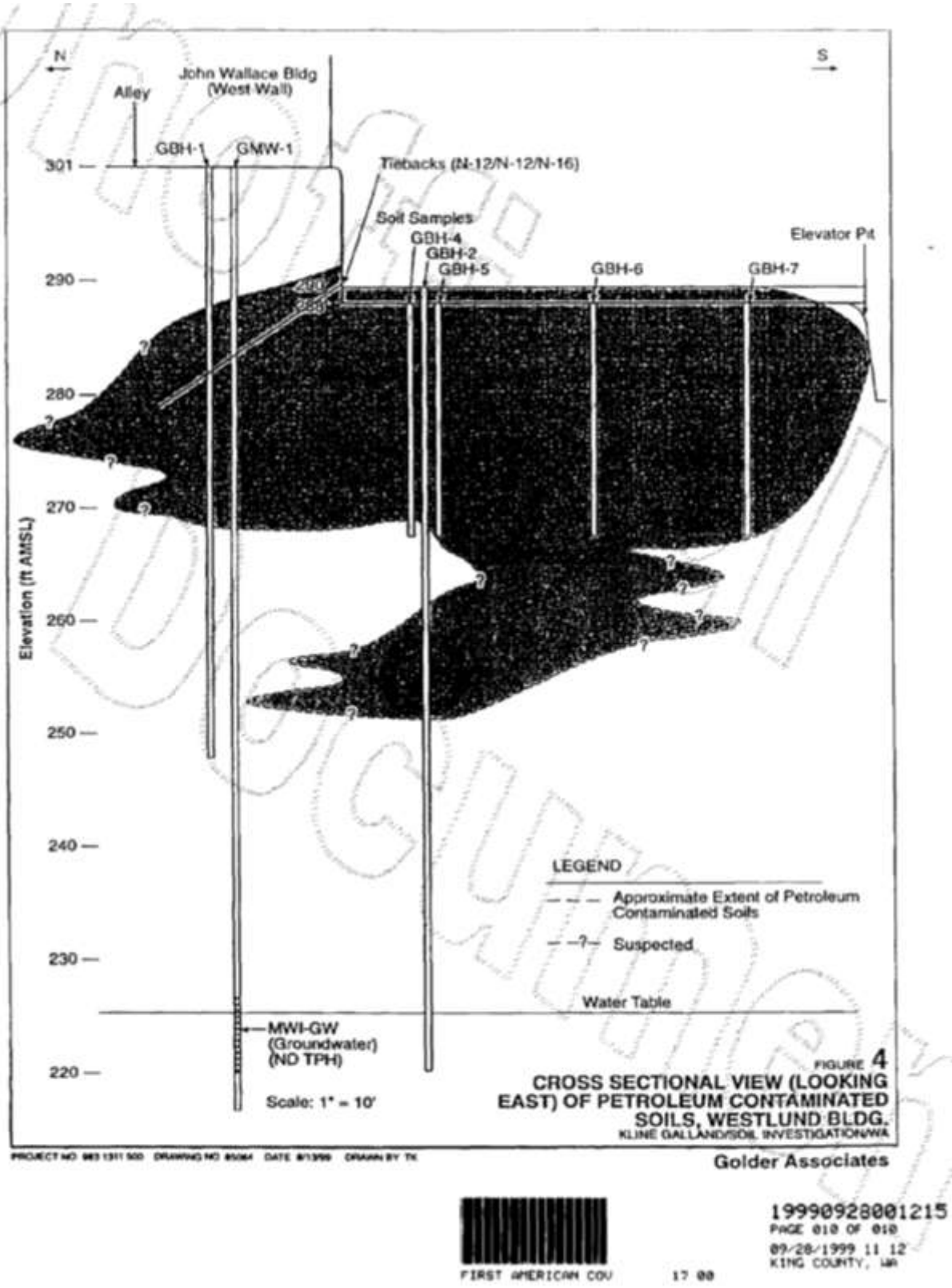


FIGURE 3
ESTIMATED LATERAL EXTENT OF PETROLEUM CONTAMINATED SOILS (DIESEL/OIL)
KLINE GALLAND/SOIL INVESTIGATION/WA

PROJECT NO 983 1311 500 DRAWING NO 85083 DATE 8/19/99 DRAWN BY TK

Golder Associates



6.5 Photo log

Photo 1: Front entrance to building - from University Street

Photo 2: John Wallace Bldg. and a rear part of The Summit at First Hill Bldg.

Photo 3: Other side of opening between buildings – area of covered contamination

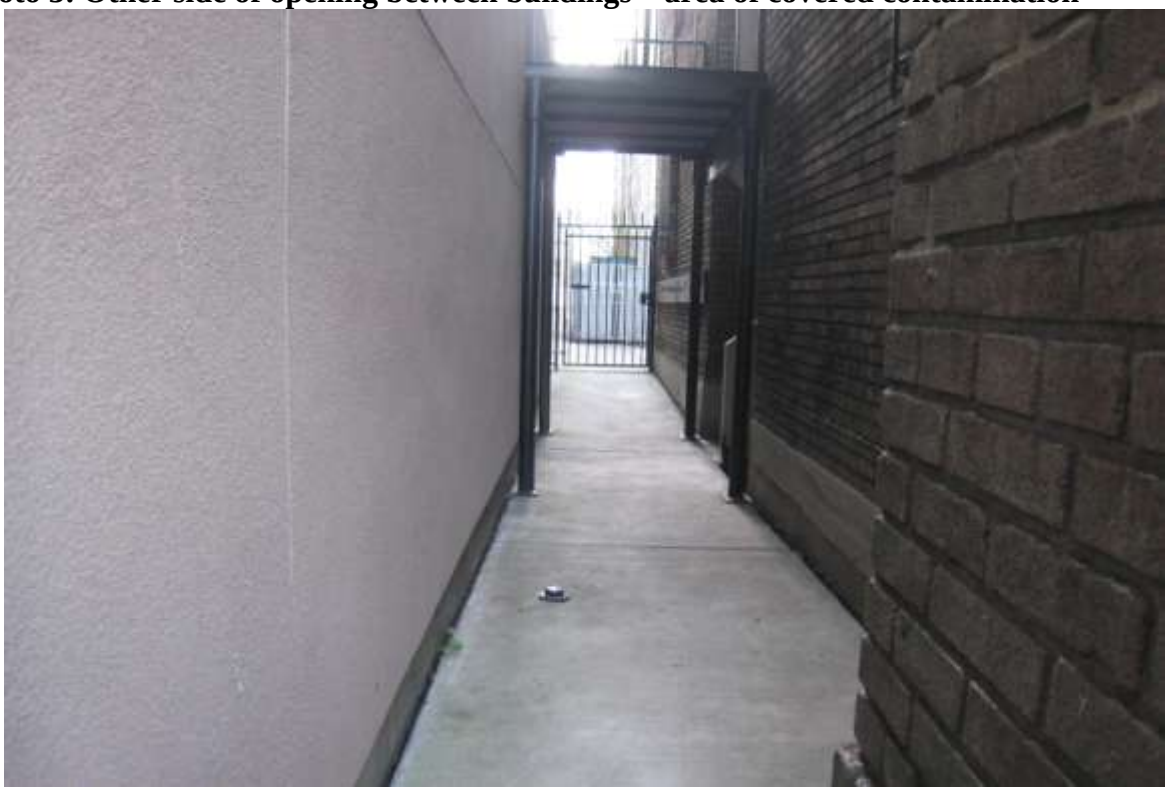


Photo 4: Monitoring well and filled hole in alley near the narrow corridor between bldgs